

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Michael L. Jones  
Plaintiff

✓

C.A. NO 07-791-GMS

Jury trial Demanded  
FILED

AUG 18 2008

U.S. DISTRICT COURT  
DISTRICT OF DELAWARE

AN

Raynard Jones and Audley Evans  
Defendants

Individually and in their official Capacity

Motion requesting extension of time to respond  
to defendants motion for summary judgment

Plaintiff respectfully request pursuant to Fed R Civ. P 6(b) an order extending the time to respond to defendants Motion for summary to November 5, 2008

This motion is made on the grounds that:

1. Plaintiff, who is representing himself on a pro se basis, is only allowed access to the prison law library through mail correspondence only which take 2 weeks for the Law Library to answer inmates responses which prevents him from completing the necessary legal research required to properly respond to Defendants motion.
2. Plaintiff also needs time to first file a motion for production of documents from defendants, documents that will better assist your honor in his decision making on the defendants motion for summary judgement to dismiss Plaintiffs claim.
3. Plaintiff also needs time to file another motion for appointment of counsel due to Plaintiffs lack of knowledge of the law and also his lack of access to the prison law library
4. Plaintiff has requested no previous extensions of time in this matter to date all of his filings with the court have been made in a timely manner

Respectfully submitted this 11 day of August 2008

By Michael L. Jones  
Michael L. Jones  
Delaware Correctional Center  
1131 Reddick Road  
Smyrna Delaware  
19977

### CERTIFICATE OF SERVICE

I, Michael L. Jones, hereby certify  
that I have served a true and correct copy of the attached motion upon the  
following party, on the 14<sup>th</sup> day of August, 2008.

1. Office of the Clerk  
344 N. KING ST LOCK BOX B  
Wilm Del 19801

2. Catherine Damavand (Attorney General)  
320 N French St 6<sup>th</sup> Floor  
Wilm Del 19801

3. \_\_\_\_\_  
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6. \_\_\_\_\_  
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8-14-08  
Date signed

Michael L. Jones  
Signature of Movant  
(Notarization not required)